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07/02/2004 12:01 PM

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"msbudlemann@bmjlaw.com" <msbudlemann@bmjlaw.com>,
"Nation, Dave" <DNation@ASARCO.com>, Clint Stanovsky
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cc: "Misko, David" <DMIS461@ECY.WA.GOV>, Kevin
Rochlin/R10/USEPA/US@EPA, "Wilson, Tim"
<TWilson2@ASARCO.com>, "O'Neill, Sue"
<SONeill@ASARCO.com>, "Thompson, Steve"
<StThompson@ASARCO.com>
Subject: RE: Everett Smelter - need for RCRA ID number

Hi Dave; thanks for assisting us on this so we can keep going forward. You're understanding is correct; all contractors up to Sound Freight (the tug/barge) are working under Asarco's number as we are within the Site as we discussed yesterday. Once on the barge, Sound will transport Source material as RCRA waste and Residential material as RCRA nonhazardous waste. All loads will be manifested to the Tacoma site for disposal prior to departure from Everett. As such, Sound will be the only transporter for material bound for Tacoma. Thanks again for your assistance. Dave

-----Original Message-----

From: South, David [mailto:DSOU461@ECY.WA.GOV]
Sent: Friday, July 02, 2004 10:31 AM
To: 'msbudlemann@bmjlaw.com'; Dave Nation; Clint Stanovsky
Cc: Misko, David
Subject: Everett Smelter - need for RCRA ID number

All who handle the waste will need a RCRA ID number. Asarco probably already has one for Everett and Tacoma. In any case, both Asarco, the tug company, and anyone else transporting the waste will need one. I don't think Strider needs one as they are working on site under Asarco's RCRA ID. All dangerous waste (greater than 3,000 ppm arsenic in the material) must be manifested.

You need to file the SITE ID form to get the registration number you need. It is available here:

<http://www.ecy.wa.gov/programs/hwtr/waste-report/index.html#Changes%20for%202003%20Annual%20Reporting>

Find the part that says: **To get a new RCRA Site ID number:** Download a blank Site ID Form. The Site ID form can be a typewriter or by hand. You will need to sign the form in ink and mail it to Ecology using the address at the top of the form.

Download the form, fill it in, and mail it or overnight it TO ME. Normally



it takes about three weeks to turn this around, but Dave Misko of our Hazardous Waste Program has graciously agreed to expedite it for this project. If you can get it to me by the 6th, you should have the required registration by the end of the week.

Call me for questions.

David L. South
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